III. REMARKS

Applicant respectfully submits that claims 2 and 4-21 are not unpatentable over Leon et al. ("Leon") (U.S. Patent No. 6,591,251) in view of Bergum et al. ("Bergum") (U.S. Patent No. 5,249,227) under 35 U.S.C. §103(a).

Leon is not prior art against Applicant's invention for purposes of 35 U.S.C. §103(a). The earliest priority date attributable to Leon is <u>July 22, 1998</u>. However, Applicant's earliest priority date is <u>March 18, 1998</u>, which precedes Leon. Thus, since Leon is subsequent to Applicant, Leon is not properly prior art. Claims 2 and 4-21 should therefore be allowable.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

15 JULY 2004

Respectfully submitted,

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